

Exhibit 3



1920 L STREET, N.W., SUITE 535
WASHINGTON, D.C. 20036
(202) 629-3530
SPARACINOPLLC.COM

December 20, 2017

By Certified Mail

Office of Information Programs and Services
A/GIS/IPS/RL
Department of State, SA-2
Washington, DC 20522-8100

Re: Freedom of Information Act Request

Dear FOIA Officer:

This is a request under the Freedom of Information Act, 5 U.S.C. §§ 552, et seq., for complete copies of the records listed below. As more thoroughly outlined below, the relevant time period for this request is: **June 1, 2004 through December 31, 2009.**

Records Requested

All records (e.g. reports, memoranda, interview notes, emails, or other communications) authored by: a) the International Criminal Investigative Training Assistance Program (**ICITAP**), or its members (dated from January 1, 2005 to December 31, 2008); or b) the Office of the **Health Attaché**, Deputy Health Attaché, or the Acting Health Attaché of the U.S. Embassy in Iraq, or any members of the foregoing (dated from June 1, 2004 to December 31, 2009); or c) the Office of the Special Inspector General for Iraq Reconstruction (**SIGIR**) (dated from June 1, 2004 to December 31, 2009); concerning:

1. Iraq's Ministry of Health ("MOH"); or
2. Dr. Adel Muhsin Abdullah al-Khazali (a/k/a Dr. Adel Muhsin, or Dr. Adel Mohsin), the Inspector General of MOH; or
3. Hakim al-Zamili (a/k/a Hakim Abbas Mousa Abbas al-Zamili (or Zamili)), Iraq's Deputy Minister of Health; or
4. Kimadia, MOH's state-owned import subsidiary; or
5. Iraq's Commission on Public Integrity ("CPI"); or
6. Judge Radhi Hamza al-Radhi (a/k/a Judge Radhi al-Radhi), the CPI Commissioner; or
7. Muqtada al-Sadr (a/k/a Muqtada Sadr);
8. Jaysh al-Mahdi (a/k/a Jaysh al-Mehdi, The Mehdi Army, The Mahdi Army, or the Mahdi Militia).

Please search for responsive records regardless of format, medium, or physical characteristics. Where possible, **please produce records electronically, in PDF format**. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs. Our request includes any letters, emails, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, discussions, and any attachments to such records.

For any responsive records you deem covered by any applicable exemption, please provide an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert. denied*, 415 U.S. 977 (1972). As you are aware, a Vaughn index must describe each document claimed as exempt with sufficient specificity "to permit a reasoned judgment as to whether the material is actually exempt under FOIA." *Founding Church of Scientology v. Bell*, 603 F.2d 945, 949 (D.C. Cir. 1979). The Vaughn index must also "describe each document or portion thereof withheld, and for each withholding it must discuss the consequences of supplying the sought-after information." *King v. US Dep't of Justice*, 830 F.2d 210, 223-24 (D.C. Cir. 1987) (emphasis added). Further, "the withholding agency must supply 'a relatively detailed justification, specifically identifying the reasons why a particular exemption is relevant and correlating those claims with the particular part of a withheld document to which they apply.'" *Id.* at 224 (citing *Mead Data Central v. US Dep't of the Air Force*, 566 F.2d 242, 251 (D.C. Cir. 1977)). See also *Johnson v. Exec. Office for U.S. Attorneys*, 310 F.3d 771, 776 (D.C. Cir. 2002). If you believe that some portions of the requested records are exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. See 5 U.S.C. § 552(b). If you believe a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. *Mead Data Central*, 566 F.2d at 261. Claims of non-segregability must be made with the same degree of detail as required for claims of exemptions in a Vaughn index.

I am willing to pay fees for this request up to a maximum of **\$200**. If the fees for this request exceed that amount, please inform me first.

Thank you for addressing my request. You can reach me by email at the address below, or by phone at (202) 629-3530. You can mail responsive materials to the address above.

Sincerely,



Sarah L. Allen

sarah.allen@sparacinopllc.com